

## **EXHIBIT B**

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July 17, 2007

**Via Email and U.S. Mail**

Paul E. Fogarty  
BURKETT, BURDETTE & FOGARTY PLLC  
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David W. Hemminger  
LYNCH, COX, GILMAN & MAHAN, PSC  
500 West Jefferson Street, Suite 2100  
Louisville, KY 40202

RE: Kreidler v. Pixler, et al. (U.S. District Court, W.D. of Wash. # CV06-0697 RSL)  
Copying of Available Documents

Dear Paul and Dave:

We have completed additional reviews and document preparation, and have more documents for your review. These documents include email messages between the various entities involved in this litigation, as well as internal communications regarding the issues in this case. We have located approximately 5,300 email messages and believe that this constitutes the extent of non-privileged messages in our database. Along with the attachments and messages, our copying service has determined that there are approximately 129,000 total pages of documents.

Because of the high volume of documents, we propose that they be produced on a CD. However, in order to Bates number these documents, they must be converted to a specific format. Typically, the charge for this conversion is 12 cents per page, but we were able to negotiate a significantly lower rate of 6 cents per page. Therefore, in order to produce them to you on a CD, we propose to share the cost of converting these documents, which will be approximately \$7,200, or \$3,600 per side. We will cover the sales tax and the additional costs

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Messrs. Fogarty and Hemminger  
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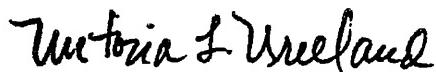
associated with numbering the documents. The estimated two (2) CDs you will receive will include numbering and there is a copying cost of \$50 per CD. On these CDs, the documents will be categorized into different folders and you will be able to search the CDs by keyword. We believe that this is the most inexpensive and efficient way to produce this high volume of documents.

We believe the CD approach makes much more sense, however. Therefore, if you are agreeable to the shared cost financial arrangement, we suggest that billing be made directly between one of your firms and the copy service. This can be coordinated through my paralegal, Natalie Leth.

Also, because of the high volume, we would also need to enter into an agreement that if any privileged documents are inadvertently produced, plaintiff does not waive the privilege. Of course, we will extend that same courtesy to you and the documents you produce. This proposal is for the purpose of expediting the production of these documents by CDs prior to our review of all 129,000 pages of documents.

We are available for a conference call if you wish to discuss this matter further. I look forward to your response.

Very truly yours,



Victoria L. Vreeland

cc: Donald S. Cohen, Esq.  
Daniel S. Potts, Esq.  
Natalie J. Leth